IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA, Plaintiff, v. MANUEL ENCARNACION, Defendant.	CRIMINAL No. 25-002 (GMM)

SENTENCING MEMORANDUM

I. Manuel comes from a humble home who started working at an early age.

Manuel Encarnación was born and raised in a rural area of Azua, Dominican Republic. He is the sixth of seven siblings, children of Virtelia Encarnación and Carmelo Casanova. His family lived in a wooden house, where they shared rooms and beds due to limited resources. They had one room for the girls, one room for the boys and one room for their parents.

Carmelo was a farmer who spent long hours in the fields and Virtelia was a stay home mother who took care of the children. All the children worked in the farms with his father when they reached certain age. Manuel started when he was 10 years old.

School was not the priority since the family's priority to survive and have food on the table was to work. Manuel started school when he was 9 years old but had to leave when he was 13 to continue farming with his father. He tried to resume his studies when he was 17 years old and wanted to complete the school, but three years later he had to quit again. While in school he

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continued farming and helping to earn a living for his family. He lived with his parents until he was 20 years old.

II. As a young adult Manuel looked for different ways to earn a living.

Manuel moved to Santo Domingo, the capital of the Dominican Republic. He moved with a younger brother who had an established food business. Following his father's values of hard work and responsibility, Manuel assisted his brother, and he worked as a fare collector on passenger buses. By the time he was 23 years old, he obtained his driver's license and became a professional driver. While being a driver he earned additional skills in mechanics to be able to provide for his services and earn some money.

III. Karina means the world to Manuel

Milagros and Manuel met when he was 26 years and working in Santo Domingo. Milagros worked at the Peruvian Embassy as a cook and in maintenance. Karina was born from their relationship and she has been the joy of his life. Manuel assumed all responsibility for his daughter and the household.

Milagros and Manuel had a good relationship for six years but later realized that it was better to be separated because they realized they wanted different things and the where not that compatible. The had an amicable separation and Manuel continued fulfilling his responsibilities as a father. He supported his daughter then financially and was present in her life.

IV. Manuel was arrested soon after the vessel landed

Looking for better opportunities, Manuel emigrated to the United States and found work as a mechanic. He was deported in 2024 and came back on the same year. Manuel was looking forward to work and continue providing for his daughter and his mother who is 86 years old. She is blind and in need of care. Manuel regrets his wrongdoing as it was a difficulty journey to embark from the Dominican Republic in a small vessel through dangerous waters. He also regrets because the consequences of his actions affected his family since he has been unable to provide for them. He wants to return to his family as soon as possible and has plans to work with his nephew who owns a car wash.

WHEREFORE, it is respectfully requested this Honorable Court take notice of the above and sentence Mr. Encarnación to the time he was already served.

I HEREBY CERTIFY that on this date I electronically filed the present motion with the Clerk of Court using the CM/ECF system that will send electronic notification of said filing to all parties of record.

RESPECTFULLY SUBMITTED

In San Juan, Puerto Rico, this 14th day of March 2025.

RACHEL BRILL
Federal Public Defender
District of Puerto Rico

S/CORAL RODRÍGUEZ
Carmen Coral Rodríguez-Morales
Assistant Federal Public Defender
USDC PR224808
241 F.D. Roosevelt Avenue
San Juan, PR   00918-2305
Phone No. (787) 281-4922
coral_codriguez@fd.org